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June 9, 2021

**VIA ECF**

Hon. John G. Koeltl  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

APPLICATION GRANTED  
SO ORDERED

  
John G. Koeltl, U.S.D.J.

6/10/21

Re: Sarimento, et al v. Eastside Barking Dog Inc., et al  
Index No.: 20-cv-03190-JGK

Your Honor:

Our office represents Plaintiff in the above-referenced matter. We write, with the consent of Defendants, to respectfully request a four-week extension of the deadline to submit the parties' joint pre-trial order and motions *in limine*, which are currently due on Monday, June 14, 2021. This is the fifth request of its kind. The Court granted Plaintiff's first four requests.

As indicated in our letter to the Court dated May 24, 2021, the parties are attempting to resolve the within action. As further indicated in our letter, based on documents produced by Defendants, and communications amongst the parties during settlement negotiations, Defendants have raised claims that may lead to Plaintiff's voluntary dismissal of the within action. Towards that end, Plaintiff hired a private investigator to ascertain the merits of those claims. Our private investigator, however, has informed us that he has not completed his investigation and is still awaiting documents from outside sources. Our investigator anticipates that he will complete his investigation, and send us the results thereof, in early July.

Accordingly, Plaintiff respectfully requests the Court to grant an extension of the deadline to submit the parties' joint pre-trial order and motions *in limine* to July 12, 2021. Plaintiff apologizes to the Court for any inconvenience.

Plaintiff thanks the Court for its time and consideration of this matter.

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Respectfully submitted,

/s/  
William K. Oates, Esq.  
Michael Faillace & Associates, P.C.  
Attorneys for Plaintiff

cc: Rob Ontell, Esq. (via ECF)